

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

UNITED STATES DISTRICT COURT

for the

WESTERN District of ARKANSASEL Dorado DivisionGEORGE FULLER

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No.

(to be filled in by the Clerk's Office)

Jury Trial: (check one) ☒ Yes ☐ No

Lion Oil Trading + Transportation
Agents LLC of Arkansas, Inc.
300 Spring Bldg, Suite 900 Little Rock, AR 72201

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

George Fuller #180665

Street Address

8200 NO More Victims Road

City and County

Jefferson City

State and Zip Code

Missouri 65101

Telephone Number

1-573-757-3224

E-mail Address

none

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

FILED
 US DISTRICT COURT
 WESTERN DISTRICT
 OF ARKANSAS
 May 14, 2019
 OFFICE OF THE CLERK

UNITED STATES DISTRICT COURT

for the

Western District of ArkansasEL Dorado Division

Thurman Fuller, Grace Fuller, Patricia
 Dockery, Elizabeth Donell, Louise Sawyer,
 George Fuller and Clara Fuller.

19-1020

Case No.

(to be filled in by the Clerk's Office)

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint.
 If the names of all the plaintiffs cannot fit in the space above,
 please write "see attached" in the space and attach an additional
 page with the full list of names.)

-v-

Lion Oil Trading and Transportation, LLC
 100 East Peach Street, Ste. 201
 EL Dorado, AR 71730

Defendant(s)

(Write the full name of each defendant who is being sued. If the
 names of all the defendants cannot fit in the space above, please
 write "see attached" in the space and attach an additional page
 with the full list of names.)

Jury Trial: (check one) ☒ Yes ☐ No

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Clara Fuller

Street Address

2313 S. Ferree Street

City and County

Kansas City, KS

State and Zip Code

66103

Telephone Number

913-789-7438

E-mail Address

bask8810@gmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

UNITED STATES DISTRICT COURT

for the

WESTERN District of ARKANSASEL Dorado DivisionGRACE FULLER

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Lion Oil Trading & Transportation
Agents USC of Arkansas, Inc.
300 Spring Bldg., Ste. 900
Little Rock, AR. 72201

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No.

(to be filled in by the Clerk's Office)

Jury Trial: (check one) ☒ Yes ☐ No

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address

Grace Fuller
2045 E. Broadway Road apt. 1053
Tempe,
Arizona, 85282
1-480-361-9241
none

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

UNITED STATES DISTRICT COURT

for the

WESTERN District of ARKANSASEL Dorado DivisionPATRICIA DUCKERY

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Lion Oil Trading & Transportation
Agent: LSC of ARKANSAS, INC.
300 Spring Bldg, Ste. 900
Little Rock, AR. 72201

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No. _____

(to be filled in by the Clerk's Office)

Jury Trial: (check one) ☒ Yes ☐ No

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Patricia Duckery

Street Address

4131 Olive Street

City and County

Kansas City, Jackson

State and Zip Code

Missouri, 64130

Telephone Number

1-816-444-3478

E-mail Address

N/A

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

UNITED STATES DISTRICT COURT

for the

WESTERN District of ARKANSASEL Dorado DivisionLOUISE SAWYER

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Lion Oil Trading + Transportation
Agent: LLC of Arkansas, INC.
300 Spring Bldg. Ste. 900, Little Rock
Arkansas 72201

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No.

(to be filled in by the Clerk's Office)

Jury Trial: (check one) ☒ Yes ☐ No

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Louise Sawyer

Street Address

4910 Farley

City and County

Shawnee, Mo.

State and Zip Code

Kansas 66203

Telephone Number

913-940-0304

E-mail Address

none

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

UNITED STATES DISTRICT COURT

for the

WESTERN District of ARKANSASEL Decade Division

Case No. _____

(to be filled in by the Clerk's Office)

Thurman Fuller

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Jury Trial: (check one) ☒ Yes ☐ No

-v-

Lion Oil Trading & Transportation
Agent: LSC of Arkansas, Inc.
300 Spring Bldg, Ste 900, Little Rock,
ARKANSAS 72201

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Thurman Fuller

Street Address

1100 NE 62 Street

City and County

Gledstone

State and Zip Code

Missouri, 64118

Telephone Number

816 484-7632

E-mail Address

N/A

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

UNITED STATES DISTRICT COURT

for the

Western District of ARKANSASEL Dorado Division

Case No. _____

(to be filled in by the Clerk's Office)

ELIZABETH DONELL

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-
Lion Oil Trading & Transportation
Agent: USC of Arkansas, Inc.
300 Spring Bldg., Ste. 900
Little Rock, AR 72201

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Jury Trial: (check one) ☒ Yes ☐ No

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Elizabeth Donell

Street Address

246 Willow Greene Drive

City and County

Bridgeport

State and Zip Code

West Virginia 26330

Telephone Number

304-657-9319 or 318-599-0290

E-mail Address

Nadadonell@yahoo.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

Defendant No. 1

Name

Lion Oil Trading and Transportation, LLC

Job or Title (if known)

Street Address

100 East Peach Street, Ste. 201

City and County

El Dorado, Union County

State and Zip Code

Arkansas 71730

Telephone Number

870-862-8111

E-mail Address (if known)

Defendant No. 2

Name

Agent: USC of Arkansas, Inc.

Job or Title (if known)

Street Address

300 Spring Bldg., Ste 900

City and County

Little Rock, Pulaski County

State and Zip Code

Arkansas 71730

Telephone Number

E-mail Address (if known)

Defendant No. 3

Name

Job or Title (if known)

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address (if known)

Defendant No. 4

Name

Job or Title (if known)

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address (if known)

b. If the defendant is a corporation

The defendant, (name) Lion Oil Trading & Transportation is incorporated under the laws of the State of (name) Arkansas, and has its principal place of business in the State of (name) Arkansas.
 Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

Possibly

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

Clara Fuller contacted Lion Oil Trading & Transportation when she found out that Millie Washington, Alonzo Washington and Angela Washington had been receiving royalties for numerous years. There were seven siblings that have not received any of the royalties, considering all siblings are heirs to the same land. Lion Oil Trading has stated their records show the above persons have received royalties, but would not state why the remaining siblings have not.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Plaintiffs want Lion Oil Trading & Transportation to pay all heirs their portion of royalties that were paid to Millie Washington, Alonzo Washington and Angela Washington. Plaintiffs want an accounting of all the money they are owed and want to receive their money as soon as possible. Plaintiffs want to know how it was possible to pay one heir without paying all the heirs. Plaintiffs believe this transaction was illegal.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 4-22-2019

Signature of Plaintiff

Printed Name of Plaintiff

Clara R. Fuller
Clara R. Fuller

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address

Ms. Clara Fuller
2313 Ferres St
Kansas City, KS 66103



1000



71730

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IN THE WESTERN DISTRICT OF ARKANSAS
United States Courthouse
101 South Jackson Ave., Room 205
EL DORADO, ARKANSAS 71730-6133